



ACTION MEMORANDUM

DATE:

SUBJECT: Confirmation of Verbal Authorization, Ceiling Increase and 12-Month Exemption for Removal Action at the Cornell-Dubilier Electronics Site, South Plainfield, Middlesex County, New Jersey

FROM: Eric J. Wilson, On-Scene Coordinator
Removal Action Branch

TO: Jeanne Fox
Regional Administrator

THRU: Richard L. Caspe, Director
Emergency and Remedial Response Division

*Deleted from
Confidential -
draft*

Site ID #: GZ

I. PURPOSE

The purpose of this Action Memorandum is to document verbal authorization, request a ceiling increase and 12-month exemption for the removal action described herein for the Cornell-Dubilier Electronics Site (Site), located in South Plainfield, Middlesex County, New Jersey 07080. On August 5 1997, the Director of the Emergency and Remedial Response Division (ERRD) granted verbal authorization of \$10,000 for the fabrication and installation of signs warning anglers not to eat fish taken from waters of the Bound Brook. On March 26, 1998 the Director of the ERRD authorized an additional \$150,000 to remove and dispose of PCB contaminated dust from the interiors of homes located near the site. The proposed project ceiling will be increased to \$425,000 of which \$332,000 is for mitigation contracting.

Conditions at the Site continue to meet the criteria for a removal action under Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as documented in Section 300.415(b)(2) of the National Contingency Plan (NCP). The Site is on the National Priorities List (NPL). There are no nationally significant or precedent-setting issues associated with this removal action.

CONCURRENCES

Name: Cornell-Dubilier

Init: ew

Date: 9/14/98

Filename: ACTION.MEM

Symbol	ERRD-RAB	ERRD-RAB	ERRD-RAB	ORC-NJSUP	ORC-NJSUP	ERRD-DD	ERRD-D	
Surname	Wilson	Rotola	Salkie	Sundram	Karlen	McCabe	Caspe	
Date								

II. SITE CONDITIONS AND BACKGROUND

The Comprehensive Environmental Response Compensation, and Liability Information System ID Number for the Site is NJD981557879.

A. Site Description

1. Removal site evaluation

Cornell-Dubilier Electronics operated at the Site from 1936 to 1962 manufacturing electronic parts and components, including capacitors. It is reported that Cornell-Dubilier tested transformer oils for an unknown period of time and that polychlorinated biphenyl (PCB) contaminated materials and other hazardous substances were deposited directly onto site soils.

EPA conducted sampling at the Site in June 1994, October 1994 and February 1996 for a Site Inspection Prioritization documenting the release of hazardous substances to the environment. Elevated concentrations of volatile organic compounds, semi-volatile organic compounds, PCBs and inorganic constituents were found in site soils. PCBs were also detected in surface waters and sediment of the Bound Brook downstream of the Site at concentrations above background. The site is a facility as defined within the meaning of section 101(9) of CERCLA.

In response to a referral from EPA Monitoring and Assessment Branch (see Appendix A), a Removal Site Evaluation (RSE) was conducted by the U.S. Environmental Protection Agency (EPA) Removal Action Branch between March 1996 and January 1997. Contamination of site soils and surface waters and sediments of the Bound Brook was confirmed during the RSE. Based on the findings of the RSE the site was determined to be eligible for a Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) removal action.

The Site was referred to EPA for removal action consideration by the New Jersey Department of Environmental Protection on April 2, 1997 (See Appendix B).

As part of a study to assess the impacts of contamination of the Bound Brook on human health and the environment water, soil, sediment and biota samples were collected from the stream corridor in June and August 1997. PCBs were detected in edible fish throughout the study area at concentrations in excess of what is considered safe to eat by the Food and Drug Administration.

Surface soil samples collected from residential properties located near the Site in June 1997 were found to contain low levels of PCBs. No immediate health threats were associated with exposure to PCBs at these levels, however, this sampling was not sufficient to adequately characterize contamination at these properties or health concerns for residents. In October 1997 approximately 20 additional soil samples were collected from each of 16 residential properties.

In November 1997, indoor dust samples were also collected at 12 of these homes. PCBs were detected in soil at concentrations up to 22 ppm and in indoor dust at concentrations up to 205 ppm.

2. Physical location

The Cornell-Dubilier Electronics Site is located at 333 Hamilton Boulevard in South Plainfield, Middlesex County, New Jersey. The Site occupies approximately 25 acres in a mixed industrial/commercial/residential area and is bordered by commercial businesses, residences, wetlands and the Bound Brook. Conrail railroad tracks cross the Bound Brook just north of the Site. Other industries are located to the northeast and east of the Site on the opposite side of the Conrail tracks. A Site location map is included as Figure 1, in Appendix C.

Residential homes are located on Spicer Avenue and on Hamilton Boulevard within 100 feet of the Site. It is estimated that 540 persons reside within 0.25 miles of the Site. The total population estimated to live within one mile of the Site is 8,700 persons.

The Bound Brook borders the Site on the east. The section of the stream that borders the Site varies in width from ten to twenty feet and in depth from one to three feet. Two miles downstream of the Site the Bound Brook flows into New Market Pond. Drainage from New Market Pond flows approximately 8.5 miles before discharging into the Raritan River. The above referenced water bodies are designated by the State of New Jersey for the maintenance, migration and propagation of the natural and established biota. There are no surface water intakes along this flow path for at least 15 miles. These water bodies are utilized as freshwater fisheries.

3. Site characteristics

During its years of operation at the Site (1936 to 1962), Cornell-Dubilier Electronics, Inc. manufactured electronic parts and components, including capacitors. In addition, it is reported that Cornell-Dubilier Electronics, Inc. tested transformer oils for an unknown period of time until they vacated the Site. It is alleged that during their operations, Cornell-Dubilier Electronics, Inc. dumped PCB-contaminated materials and other hazardous substances directly onto site soils.

The Site is currently known as the Hamilton Industrial Park and is occupied by 15 businesses. The owner of the property is DSC Enterprises of Newark, Inc. Through the years, dozens of companies have operated at the Site as tenants.

A site stabilization removal action was performed by the owner of Hamilton Industrial Park. This action is described in Section II B of this memorandum.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

The results of EPA's sampling and analyses indicate elevated concentrations of volatile organic compounds (VOCs), semi-volatile organic compounds, PCBs and inorganic constituents in the site soils. Building interiors at the Site were found to contain elevated levels of PCBs and metals. Off-site investigations conducted by EPA have revealed the presence of PCBs in soils and in house dust at several residences located near the site. Fish collected from the Bound Brook were found to contain PCBs at concentrations higher than allowed by the Food and Drug Administration.

On June 8, 1994, the U.S. EPA collected soil, sediment, and surface water samples from the Site. PCBs and lead were detected in soil at concentrations up to 1,100 milligrams per kilogram (mg/kg) and 2,200 mg/kg, respectively. Aroclor-1254, a PCB was detected in soil at concentrations ranging from 6.9 mg/kg to 1100 mg/kg. Heavy metals were detected in the soil at maximum concentration as follows: arsenic (25.7 mg/kg), cadmium (36.7 mg/kg), chromium (78.6 mg/l), copper (3,020 mg/kg), mercury (2.9 mg/kg), silver (26.7 mg/kg), and zinc (1,380 mg/kg). A sediment sample collected from the stream near the rear of the property revealed the presence of Aroclor-1254 at 550 mg/kg. 1,2-dichloroethene (51 micrograms per kilogram (ug/kg)), trichloroethene (120 ug/kg), and lead (552 mg/kg) were also detected in this same sediment sample. Aroclor-1254 was detected in surface water samples at levels up to 20 micrograms per liter (ug/l). Aroclor-1248, 1,2-dichloroethene, and trichloroethene were detected at this same location at 24 ug/l, 100 ug/l, and 2 ug/l, respectively. With respect to heavy metals, the maximum values detected in the surface water were: arsenic (15.6 ug/l), cadmium (14.5 ug/l), chromium (25.7 ug/l), copper (89.5 ug/l), lead (180 ug/l), mercury (0.23 ug/l), silver (3.8 ug/l), and zinc (994 ug/l).

On June 27 and 29, 1996, the U.S. EPA collected surface and subsurface soil samples from a roadway, a vacant field, and a foot/bike path on the Site. The maximum Aroclor-1254 concentration (51,000 mg/kg) detected in the surface soil was collected near the northeast corner of the fenced area, where electrical and transformer parts were exposed. Additional surface soil samples collected within the fenced area indicated the presence of Aroclor-1254 at 98 mg/kg, 270 mg/kg, and 4,700 mg/kg. The maximum Aroclor-1254 concentration detected on the surface of the Site roadway was 340 mg/kg. The average Aroclor-1254 detected on the surface of the Site roadway was 87.5 mg/kg. The maximum concentrations of Aroclor-1254 detected just beneath the unpaved stone/gravel layer of the Site roadway, ranged from 1,000 mg/kg to 22,000 mg/kg. Elevated levels of Aroclor-1254 (90 mg/kg to 3,000 mg/kg) were also detected at the surface, along and in the vicinity of, the foot/bike path at the rear portion of the Site. A sample collected in the floodplain of the stream, down slope from the exposed waste, contained 100 mg/kg of Aroclor-1254.

The average lead concentration detected on the surface of the Site roadway was 167.6 mg/kg. The maximum lead and cadmium concentrations on the surface of the Site roadway were 340 mg/kg and 19 mg/kg, respectively. The concentration of lead detected beneath the unpaved stone/gravel layer of the Site roadway ranged from 1,740 mg/kg to 7,460 mg/kg. Cadmium was also detected at a concentration of 373 mg/kg. Some of the highest levels of lead (1,740 mg/kg -

66,600 mg/kg) and cadmium (43 mg/kg - 271 mg/kg) were noted near the foot/bike path and the northeast corner of the fenced area, within the area where the exposed waste is present.

On July 16, 1996, test pits were excavated in the vacant field and additional soil samples were collected. The test pits revealed stained subsurface soils, drum carcasses, electrical parts, mica-like chips, wood, and debris. Aroclor-1254 and lead were detected at concentrations as high as 1,900 mg/kg and 1,970 mg/kg, respectively, in samples collected from the test pits.

On March 21, 1997, EPA conducted wipe sampling in twelve buildings located at the Site. Aroclor-1254 was found ranging in concentration from 1.5 micrograms per 100 square centimeters (ug/100cm²) to 500 ug/100cm². Weathered Aroclor-1260 was found ranging in concentration from 0.9 ug/100cm² to 180 ug/100cm². Lead was detected in concentrations ranging from 0.67 ug/100cm² to 780 ug/100cm². Cadmium was detected in concentrations ranging from 0.09 ug/100cm² to 34 ug/100cm².

On June 9, 1997, EPA conducted chip and vacuum sampling of two building interiors at the Site. Aroclor-1248 and Aroclor-1254 were detected at concentrations as high as 31,000 mg/kg and 57,000 mg/kg, respectively, in chip samples collected.

In June 1997, EPA initiated a study to determine the impacts of contamination of the Bound Brook on human health and the environment. Soil, sediment, water, and biota (fish, crayfish, and small mammals) samples were collected along the Bound Brook adjacent to and downstream of the Site. Samples of edible fish were collected from the Bound Brook, New Market Pond and Spring Lake for use in assessing human health risks. Preliminary sampling indicated that Aroclor-1254 was detected in concentrations up to 13,000 ug/kg in the sediment and up to 6,200 ug/kg in the flood plain soils. Copper, zinc, lead, and barium was also detected up to 210, 620, 540, and 380 mg/kg, respectively. Aroclor-1248 and Aroclor-1254 were detected in all fillet samples in all species collected including carp, white sucker, pumpkin seed, and largemouth bass. Seven pesticides were also detected in the edible fish samples.

In October 1997, EPA collected soil samples at residential properties located near the site. Aroclor-1254 and Aroclor-1260 were detected in soil samples at concentrations as high as 22 mg/kg and 2.2 mg/kg, respectively.

In November 1997, EPA collected interior dust samples at residential properties located near the site. Aroclor-1254 and Aroclor-1260 were detected in dust samples at concentrations as high as 120 ppm and 85 ppm, respectively.

The mechanism for past releases to the environment appears to have been the waste disposal practices at the Site. The contamination in the adjoining stream may have occurred due to a combination of direct discharges, surface water runoff and/or groundwater migration from the Site.

5. NPL status

The site was added to the NPL on July 27, 1998.

6. Maps, pictures, and other graphics representations

Figures included in Appendix C provide the location of the Site and sampling locations.

B. Other Actions to Date

1. Previous actions

On April 7, 1997, EPA personnel installed temporary fencing and warning signs at each end of a footpath that crosses the site to block pedestrian access to the disposal area. In addition, several large capacitors, which were leaking oil, were collected and over packed.

On March 25, 1997 a unilateral administrative order ("Order") was issued to the owner of the industrial park which required that a removal action be taken to stabilize the site. The scope of work specified in the Order included the paving of facility driveways and parking areas, installing security fence and silt fence to limit migration of contaminants off-site and posting of warning signs. The site stabilization removal action was initiated on July 7, 1997. The paving, installation of security fence and silt fence and posting of warning signs has been completed. A final report documenting this removal action remains to be completed.

2. Current actions

On August 7, 1997, EPA initiated a removal action to fabricate and post signs warning anglers not to eat fish taken from the Bound Brook and New Market Pond. PCBs were found in samples collected of edible fish taken from these waters. On the morning of August 8, EPA and the New Jersey Department of Environmental Protection (NJDEP) met with elected officials from the affected communities to inform them of these sampling results and planned actions to address public health concerns. Later that day, in a joint press conference EPA announced the results of the edible fish sampling and NJDEP announced the interim fish consumption advisory for the Bound Brook. Warning signs were installed at access points to the Bound Brook and New Market Pond on August 8 and 9, 1997. This removal action was completed August 9, 1997 at a cost of \$3,485.

Soil samples collected in June 1997 from the residential community surrounding the site revealed the presence of PCBs. This sampling was not adequate to determine the extent of PCB contamination or characterize health risks to residents. A phased approach is being employed to determine the extent of PCB contamination in the residential community and characterize health risks. In October and November 1997 soil and indoor dust samples were collected from 12 residential properties located near the site, soil samples only were collected from an additional 4

residential properties. These properties have been designated as Tier 1, and include 15 properties located on Spicer Avenue between Hamilton Boulevard and Belmont Avenue and 1 property located on Metuchen Road. Figure 2 in Appendix C shows the location of residential properties sampled. PCBs were detected at Tier 1 properties at concentrations up to 22 mg/kg in surface soils and 205 mg/kg in indoor dust. The Agency for Toxic Substances and Disease Registry (ATSDR) has reviewed this data and concluded that the actual or potential health concerns exist at the homes sampled.

In response to finding PCBs at levels of potential health concern at Tier 1 homes, soil and indoor dust samples were collected to characterize health risks from 19 additional residential properties bordering Tier 1 in April 1998. These homes have been designated as Tier 2 and are located on the northeast side of Delmore Avenue between Hamilton Boulevard and Belmont Avenue and on Hamilton Boulevard between Lakview Avenue and Amboy Avenue. The results of this sampling are being evaluated by ATSDR and EPA risk assessors.

Screening soil samples were collected at 100 foot interval in the area surrounding the site and Tier 2 in May 1998. Data from this sampling event will be used to determine if additional sampling is necessary to characterize health risks in this area.

On March 29, 1998, EPA initiated a removal action to clean the interiors of Tier 1 homes where PCBs were found in indoor house dust at levels of potential public health concern. The cleaning was initiated on April 4, 1998 and completed April 26, 1998. Seven homes were cleaned as part of this action. The cost to date for this action is \$139,410. Post-cleaning, indoor dust samples were collected to determine the effectiveness of the cleaning. The results of analysis of these samples will be used to determine if additional actions are necessary at these homes.

C. State and Local Authorities' Role

1. State and local actions to date

There have been no State or local remedial actions taken at the Site. The New Jersey Department of Health and Senior Services (NJDHSS) is providing health consultations to the EPA through ATSDR. Based on the results of EPA's sampling, the NJDEP issued a fish consumption advisory for the Bound Brook and its tributaries including Newmarket Pond and Spring Lake.

2. Potential for continued state/local response

It is anticipated that the NJDHSS will continue to provide technical assistance to the EPA concerning health issues at the Site. At this time it is not known whether there will be any other future State or local actions taken at the Site.

III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENT AND STATUTORY AND REGULATORY AUTHORITIES

The following factors described in 40 CFR Part 300.415(b)(2) of the National Contingency Plan (NCP) were applied in determining the appropriateness of a removal action at the Site.

- (i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants; and
- (ii) The availability of other appropriate federal or state response mechanisms to respond to the release.

A. Threats to Public Health or Welfare

Samples of edible fish collected from the Bound Brook and New Market Pond by EPA in June 1997 were found to contain PCBs at concentrations ranging from 0.25 to 36 mg/kg. Based on a review of the data from this sampling event, ATSDR concluded that the PCBs are present in the fish collected at concentrations that exceed the Food and Drug Administration tolerance level of 2 ppm and are a public health concern. The Bound Brook and New Market Pond are utilized as fresh water fisheries. Individuals that consume fish that contain elevated levels of PCBs can be exposed at levels of public health concern. In humans long term exposure to PCBs can affect the skin and liver; reproductive, endocrine, immunosuppressive and carcinogenic effects have been observed in animal studies. A Health Consultation prepared by ATSDR regarding consumption of fish from the Bound Brook is included in Appendix D. No other local, state or federal response mechanism was available to take timely action to post these water bodies with signs warning anglers not to eat the fish.

PCBs were detected in soil and in dust at several of the Tier 1 homes sampled in October and November 1997. On May 28, 1998 ATSDR issued a Public Health Consultation for the site which addresses health concerns for residents of homes sampled by EPA in October and November 1998 from exposure to PCBs in indoor dust and surface soils. Based on a review of the data from these sampling events, ATSDR concluded that the levels of PCBs detected in indoor dust and surface soils may pose a health concern or a potential health concern to residents and recommended that actions be taken to reduce or stop potential exposure to indoor dust and surface soil contaminated with PCBs. ATSDR's Health Consultation for the residential properties sampled in October and November 1997 is included in Appendix D.

A screening level risk assessment was prepared by EPA Program Support Branch based on the data collected by EPA from residential properties located near the site in October and November 1997, this document is included in Appendix E. Cancer and non-cancer health risks were estimated for each property sampled for exposure to PCBs in surface soil and indoor house dust. The calculated cancer risks exceed 1×10^{-4} at two properties, calculated non-cancer risks exceed a Hazard Index of 1 at 10 properties.

The results of analysis of indoor dust samples collected by EPA in April 1998 from Tier 1 (post-cleaning) and Tier 2 homes are being evaluated by ATSDR and EPA risk assessors. Based on a preliminary review of this data ATSDR has indicated that actions are required to address health concerns from exposure to PCBs in interior house dust at 8 residences. EPA's risk assessor concurred with ATSDR's conclusions regarding the need for corrective action at these 8 homes.

B. Threats to the Environment

EPA's investigation of ecological impacts of contamination of the Bound Brook documented many contaminants at relatively high levels adjacent to and/or immediately down gradient of the Site, indicating that the Site is the primary source of many of the contaminants of concern within the section of the Bound Brook corridor investigated. An ecological risk assessment conducted based on the results of this investigation found that the structure and function of the Bound Brook and its stream corridor adjacent to and downstream of the site is at risk from chemical contamination. Benthic organisms, fish, birds, omnivorous mammals and carnivorous mammals utilizing the stream and stream corridor were determined to be at risk.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. EXEMPTION FROM STATUTORY LIMITS

A. Consistency Exemption

1. Continued response actions are otherwise appropriate and consistent with the remedial action to be taken. Section 104(c) of CERCLA, as amended, limits removal actions to 12 months unless an exemption is justified by an emergency or a determination of consistency with the remedial action. Exposure to PCBs in dust within the home may pose a health concern or a potential health concern to residents. The removal of PCBs from the interiors of the affected homes is an appropriate response action and is necessary to protect the health and welfare of residents. Future remedial actions would need to address health concerns associated with interior PCB contamination.

VI. PROPOSED ACTIONS AND ESTIMATED COST

A. Proposed Actions

1. Proposed action description

Actions taken to educate the public about the health concerns associated with consumption of fish taken from the waters of Bound Brook and New Market Pond are discussed in Section II B 2 of this memorandum.

ATSDR determined that the level of PCBs detected in indoor house dust in 9 of the homes samples in November 1997, posed a health concern or a potential health concern for residents. Interior house cleaning was offered to the residents of these homes. Residents of seven of these homes accepted the cleaning offered, residents of 2 of the homes sampled refused cleaning.

The scope of work for this removal action includes the cleaning of homes where health concerns or potential health concerns exist and the temporary relocation of residents during the cleaning. The cleaning procedures employed included: wiping down all horizontal exposed surfaces; vacuuming floors, drapes upholstery, molding and window casings using HEPA vacuums; washing all tile, linoleum and wood floors; steam cleaning carpets and area rugs; cleaning heating and cooling ducts and cleaning or replacing all filters on air handling equipment. The cleaning was conducted in April 1998.

Post-cleaning indoor dust samples were collected at the seven homes cleaned as part of this removal action to determine the effectiveness of the cleaning. A second set of indoor dust samples were collected from the two homes that refused cleaning.

Based on a review of the results of samples collected in April 1998, ATSDR concluded that the level of PCBs found in dust in eight homes pose a potential public health concern. Additional funds are requested at this time, to clean the interiors of eight homes or partially clean the interiors of more than eight homes as necessary to address potential public health concerns associated with exposure to PCBs in residential house dust.

2. Contribution to remedial performance

Removal action at the Site is consistent with the requirement of Section 104(a)(2) of CERCLA, which states, "any removal action undertaken...should...to the extent practicable, contribute to the efficient performance of any long-term remedial action with respect to the release or the threatened release concerned." These actions will mitigate threats posed to human health which would otherwise have to be addressed through remedial action.

3. Description of alternative technologies

No alternative technologies were considered for these removal actions.

4. EE/CA

Due to the time critical nature of these removal actions, an EE/CA was not prepared.

5. Applicable or Relevant and Appropriate Requirements (ARARS)

ARARS that are within the scope of these actions were met to the extent practicable. Federal ARARS determined to be applicable include the Occupational Safety and Health Act, the Resource Conservation and Recovery Act and the Toxic Substances Control Act.

6. Project schedule

Removal activities will continue upon approval of the funding requested. Where possible, interior cleaning will be conducted after the removal PCB contaminated soil is completed.

B. Estimated Costs

The estimated costs for the completion of this project are summarized below.

	<u>Current Ceiling</u>	<u>Cost to Date</u>	<u>Proposed Ceiling</u>
<u>EXTRAMURAL COSTS:</u>			
<u>Regional Allowance Costs:</u>			
ERRS Cleanup contractor: (including contingency)	\$140,000	\$134,445	\$ 332,000
<u>Other Extramural Costs:</u>			
START	<u>10,000</u>	<u>4,965</u>	<u>22,000</u>
Subtotal Extramural Costs	150,000	NA	354,000
Extramural Cost Contingency	<u>0</u>	<u>NA</u>	<u>41,000</u>
TOTAL EXTRAMURAL COSTS	\$150,000	\$139,410	\$395,000
<u>INTRAMURAL COSTS:</u>			
Intramural Direct Costs	3,300	NA	10,000
Intramural Indirect Costs	<u>6,700</u>	<u>NA</u>	<u>20,000</u>
TOTAL INTRAMURAL COSTS	<u>10,000</u>	<u>7,600</u>	<u>30,000</u>
TOTAL PROJECT CEILING	\$160,000	\$147,010	\$425,000

VII. EXPECTED CHANGE IN THE SITUATION SHOULD NO ACTION BE TAKEN OR ACTION DELAYED

Not applicable.

VIII. OUTSTANDING POLICY ISSUES

No known outstanding policy issues are associated with this removal action.

IX. ENFORCEMENT

On February 4, 1997 Notice Letters were issued to two potentially responsible parties for the Cornell-Dubilier Electronics Site.

X. RECOMMENDATION

This decision document represents the selected removal action for the Cornell-Dubilier Electronics Site located in South Plainfield, Middlesex County, New Jersey developed in accordance with CERCLA, as amended, and not inconsistent with the NCP. This decision is based on the administrative record for the Site.

Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and the CERCLA section 104(c) consistency exemption from the 12-month limitation. The total project ceiling, if approved, will be \$425,000. Of this, an estimated \$332,000 is for mitigation contracting.

Please approve the ceiling increase and 12-month exemption for the Cornell-Dubilier Electronics Site as per current Delegation of Authority, by signing below.

APPROVAL: _____

Jeanne Fox
Regional Administrator

DATE: _____

DISAPPROVAL: _____

Jeanne Fox
Regional Administrator

DATE: _____